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Before the

Federal Communications Commission

Washington, DC 20554

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AUG - 7 2003

Federal Communications Commission
Office of Secretary

In re application of:	)	
	)	
WORLDCOM, INC., and its Subsidiaries as DEBTOR IN POSSESSION	)	
Transferor	)	
	)	
AND	)	WC Docket 02-215
	)	
MCI, INC. and its Subsidiaries	)	
Transferee	)	
	)	
For consent to transfer of control of licenses and authorizations held by WorldCom in bankruptcy	)	

To The Commission

PETITION TO DENY TRANSFER OF LICENSES, AUTHORIZATIONS, AND CERTIFICATIONS OF WORLDCOM, INC.

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August 7, 2003

TABLE OF CONTENTS

	Page
Summary..	i
Margaret F. Snyder..	2
The Accounting Fraud..	3
Material Misrepresentations to the FCC.........................	8
The "New and Improved" WorldCom is still making material misrepresentations to the FCC................	10
Conclusion...	13

SUMMARY

WorldCom, Inc has knowingly made false and criminally fraudulent statements to the Federal Communications Commission and Securities and Exchange Commission As a result of its fraudulent representations, WorldCom was able to perpetrate the greatest accounting fraud in the history of the United States Ten of thousands of innocent investors suffered serious economic loss. The public lost faith in securities and in the integrity of the telecommunications infrastructure

For the reasons stated herein, WorldCom lacks the character qualifications to be a Commission licensee. Accordingly, its licenses, authorizations, and certifications should be revoked

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To. The Commission

PETITION TO DENY TRANSFER OF LICENSES, AUTHORIZATIONS, AND CERTIFICATIONS OF WORLDCOM, INC.

Margaret F Snyder, by her attorneys, hereby petitions to deny the above referenced applications for transfer of control of WorldCom, Inc.'s ("WorldCom") licenses, authorizations and certifications. As discussed herein, the evidence shows that WorldCom lacks the basic character qualifications to be a Commission licensee. Mrs. Snyder requests that the FCC designate for revocation hearing, WorldCom's licenses, authorizations, and certifications [1] If after a full hearing, based on the evidence presented, the presiding judge determines that WorldCom, (1) knowingly made false statements to the FCC, (2) defrauded its competitors, or (3) made fraudulent statements to

[1] On July 9, 2003 the FCC issued a Public Notice, which established a pleading cycle for the above reference transfer of control applications The Public Notice provides a detailed list of WorldCom's licenses, authorizations and certifications

the Securities and Exchange Commission ("SEC"), and otherwise engaged in fraudulent or criminal behavior, then WorldCom's licenses and authorizations should be revoked.

MARGARET F. SNYDER

Mrs. Snyder is a widowed 79 year-old retired elementary schoolteacher See Mrs Snyder's Declaration attached hereto as Exhibit 1. She relies on a pension and small nest egg Mrs Snyder, a MCI/WorldCom shareholder since 1988, purchased her WorldCom shares because she believed that "WorldCom was a solid and safe investment." While not a sophisticated investor, Mrs Snyder had good reason to believe that WorldCom was a solid and safe investment. She received regular reports from WorldCom, which portrayed WorldCom as a safe, well managed company. Nothing could have been further from the truth. WorldCom, its managers, officers and directors knowingly and maliciously lied to Mrs Snyder and tens of thousands of investors like her.

The result of WorldCom's accounting fraud has been well publicized Mrs. Snyder's investment in WorldCom that at one time was worth approximately $295,971 is now worth $229 Mrs. Snyder likes to travel, but she can no longer afford to do so She had established a savings account for the education of her two grandchildren but after her WorldCom stock became practically worthless she was forced to ask for the money back. As she states in her Declaration: "I have lost my sense of independence and security that I once had because of the diminution in the value of my WorldCom stock."

Mrs. Snyder understands that she will never get her money back Nor is she before the FCC to ask for her money back. Rather, she seeks justice. The FCC's rules and policies are clear, when a licensee engages in fraudulent and criminal behavior of the type engaged in by WorldCom, it forfeits its right to be a licensee. Mrs. Snyder asks that the FCC apply its well-established rules and policies, which were set in place for the protection of the public, and revoke the licenses and authorizations held by WorldCom and its subsidiaries.

THE ACCOUNTING FRAUD

On June 25, 2002, WorldCom announced that it would restate its financial statements for 2001 and the first quarter of 2002. Less than a month later, WorldCom and substantially all of its active subsidiaries filed petitions for reorganization under Chapter 11 of the Bankruptcy Code.

On June 26, 2002, the United States Security and Exchange Commission filed a civil suit in which the SEC charged WorldCom with a massive accounting fraud [2] The SEC's complaint alleged that WorldCom fraudulently overstated its income in 2001 and 2002. The complaint further alleged that WorldCom falsely portrayed itself as a profitable business during 2001 and the first quarter of 2002 by reporting earnings that it did not have. These actions were intended to mislead investors and manipulate WorldCom's earnings to keep them in line with estimates by Wall Street analysts. The SEC complaint charged the fraudulent reporting was "directed and approved by WorldCom's senior management." The SEC was so concerned about WorldCom's fraudulent behavior that it immediately sought and received a court order barring WorldCom from destroying documents, providing payouts to senior executives or disposing of assets.

WorldCom did not challenge the SEC's allegations of fraud; instead it entered into a consent decree with the SEC and agreed to pay a civil penalty Judge Jed Rakoff,

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[2] *Security and Exchange Commission v WorldCom, Inc*, No. 02-CV-4963,

in his Opinion approving the consent decree wrote, "[i]n the case of WorldCom, Inc., we have perhaps the largest accounting fraud in history, with the company's income overstated by estimated $11 billion, its balance sheet overstated by more than $75 billion, and the loss to shareholders estimated at as much as $200 billion."

Many of WorldCom's top managers have been indicted, pled guilty or, along with WorldCom, are being criminally investigated by the Department of Justice. WorldCom's former Chief Financial Officer, Treasurer, and Secretary Scott D. Sullivan was indicted on numerous criminal counts, including securities fraud, conspiracy, and filing false statements with the SEC. Mrs Snyder notes with interest that Sullivan is currently free on 10 million dollars bail, which bail is secured, in part, by a 5 million dollar lien on his 15 million dollar Boca Raton, Florida home. No doubt, along with the house, Sullivan enjoyed the other appurtenances of the good life, like expensive cars and luxurious vacations in exotic places. At the time of Sullivan's arrest, U.S. Attorney General John Ashcroft said, "[c]orrupt corporate executives are no better than common thieves when they betray their employees and steal from their investors " Mrs. Snyder must respectfully disagree with Attorney General Ashcroft on one key point; common thieves do not have really fantastic Florida real estate holdings Sullivan is not a common thief He was not driven to crime out of hunger, desperation, or need. His is the most despicable of crimes, he had every material thing a man could want and yet he was willing to steal to get more.

Among other WorldCom officers who have been indicted and pled guilty are David F Myers, WorldCom's Senior Vice President and Controller, and Buford Yates, Jr., WorldCom's Director of General Accounting. Myers and Yates have pled guilty to numerous felony counts, including, conspiracy to commit securities fraud, making false statements in public filings, making false statements to the SEC in annual and quarterly reports, making false statements to auditors, and falsifying books, records and accounts. Simply stated, they have admitted in open court that they knowingly and willingly participated in a scheme to cook WorldCom's books

WorldCom's fraudulent behavior is within the range of character qualifications the FCC considers in licensing proceedings

> The Commission acknowledges that there may be circumstances in which an applicant has engaged in nonbroadcast misconduct so egregious as to shock the conscience and evoke almost universal disapprobation. . . . Such misconduct might, of its own nature, constitute prima facie evidence that the applicant lacks the traits of reliability and/or truthfulness necessary to be a licensee . .

Policy Regarding Character Qualifications, (*"Character Policy Statement"*) 102 FCC 2nd 1179, 1205 (1986).[3] Specifically, WorldCom's actions fall under the category of non-FCC misconduct, that is misconduct which may be in violation of law but does not specifically contravene the Communications Act or a specific Commission rule or policy.

> We believe that the non-FCC behavior of concern to us is that which allows us to predict whether an applicant has or lacks the character traits of "truthfulness" and "reliability" that we have found relevant to the qualifications to operate a broadcast station in accordance with the requirements of the Communications Act and of our rules and policies.

Id at1195. In its *Character Policy Statement* the FCC concluded that it would consider three types of misconduct (1) fraudulent statements to government agencies; (2) certain

[3] In 1988, the Commission held that the *Character Policy Statement* – which had originally been drafted for and applied only to broadcast licensees – was to be applied to common carrier licensees as well *See MCI Telecommunications Corp* , 3 FCC Rcd 509, para 31 (1988)(citing *Character Policy Statement*, 1195-97, 1200-03, *modified*, 5 FCC Rcd 3252 (1990), *recon granted in part*, 6 FCC Rcd 3448 (1991), *modified in part*, 7 FCC Rcd 6564, 6566 (1992))

criminal convictions, and (3) certain violations related to anti-competitive and antitrust statutes *Id* at p 1195

WorldCom's misconduct falls squarely within the first two points. The FCC concluded that criminal convictions involving false statements or dishonesty are relevant to predicting the propensity for an applicant to deal truthfully with the Commission. *Id* at p. 1195-96 The FCC also found that there was a nexus between fraudulent representations to another government agency and the possibility that an applicant might engage in similar behavior in its dealings with the FCC. This nexus certainly exists in this case, as discussed below Not only did WorldCom make material misrepresentations to the FCC at the time it was perpetrating the accounting fraud, but the WorldCom's pending applications for transfer of control contain numerous statements that lack candor or have material misrepresentations.

On March 31, 2003, the Special Investigative Committee of the Board of Directors of WorldCom issued a 345 page Report of Investigation. The Report finds numerous persons to blame, but none of the blame is attributed to WorldCom's current management. WorldCom claims that it made a through investigation, yet it admits that in preparing its report it failed to interview Bernard J Ebbers, Scott D. Johnson, David Myers, Buford Yates, Jr , Mark Abide, or any representatives of Arthur Anderson, WorldCom's accounting firm at the time the fraud was committed In other words, WorldCom failed to interview any of the key participants in the preparation of its report. Nonetheless. WorldCom claims that it no longer employs any of the people whose conduct was responsible for the accounting fraud.

WorldCom's current management blames Ebbers and Sullivan and the other people it did not interview While these were certainly the key players, this does not mean the others, still employed by WorldCom, did not significantly participate in the corporate fraud that led to WorldCom's bankruptcy and the loss of Mrs. Snyder's investment One paragraph in the report under the heading "WorldCom's Culture" sheds some light As WorldCom admits:

> Numerous individuals – most of them in financial and accounting departments, at many levels of the Company and in different locations around the world – became aware in varying degrees of senior management's misconduct. Had one or more of these individuals come forward earlier and raised their complaints with Human Resources, Internal Audit, the Law and Public Policy Department, Anderson, the Audit Committee, individual Directors and/or federal or state government regulators, perhaps the fraud would not have gone on for so long Why didn't they?

Why indeed? As Judge Rakoff noted in his opinion, WorldCom had overstated its balance sheet by more than $75 billion This is a tremendous amount of money, the magnitude of which cannot be concealed from knowledgeable employees Managers in the purchasing department must have known that operating expenses were being capitalized. The marketing and sales departments surely knew that income was being overstated. Certainly numerous mid-level managers knew that a fraud was being perpetrated on WorldCom's investors. Yet they all kept quiet. And now that Ebbers, Sullivan and the others are gone, those that participated, or acquiesced to the fraud, have been rewarded, either by being able to keep the jobs they do not deserve or by receiving promotions to fill the places of those whose culpability could not be denied To quote the lyrics from The Who's song *Won't Get Fooled Again*: "Meet the new boss, same as the old boss "

MATERIAL MISREPRESENTATIONS TO THE FCC

The FCC has consistently found that certain actions by a licensee are so egregious and outside the realm of acceptable conduct that they disqualify it from remaining a FCC licensee FCC-related misconduct raises the question of "whether the licensee will in the future be likely to be forthright in its dealings with the Commission and to operate its station consistent with the requirements of the Communications Act and the Commission's Rules and policies"[4] Where the FCC has found that a licensee has intentionally deceived the FCC or recklessly disregarded the truth, it has disqualified the licensee and revoked its licenses[5] WorldCom has certainly demonstrated its willingness to intentionally deceive, not only the SEC, but also the FCC.

It is undeniable that WorldCom engaged in disqualifying misconduct before the FCC by knowingly submitting fraudulent and inaccurate financial information. Under longstanding Commission rules, WorldCom and other telecommunications entities must report a variety of financial and revenue data to the Commission on a periodic basis. For example, Sections 1.785(b) and 43.21(b) of the Commission's rules require WorldCom and other carriers to submit to the FCC "verified" copies of the 10-K reports they have submitted to the SEC.[6] WorldCom and other carriers must also annually report to the FCC their operating revenues each year and the value of their total communications plant at the end of that year[7] In addition, carriers, including WorldCom, must report data on

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[4] *Character Policy Statement*, 102 F C C 2d 1179, para 55

[5] *See, e g WOKO v FCC*, 329 U S 223, 226-227 (1946) "The fact of concealment may be more significant than the facts concealed The willingness to deceive a regulatory body may be disclosed by immaterial and useless deceptions as well as by material and persuasive ones"

[6] 47 C F R §§ 1 785(b), 43 21(b)

[7] 47 C F R § 43 21(c)

gross billed revenues on an annual and quarterly basis[8] This data is filed on FCC Form 499-A or 499-Q, signed by an officer of the company, and (along with revenue information collected in September of each year) is used by the Commission to calculate regulatory fees as well as contributions to support the Universal Service Fund, Local Number Portability Administration, North American Numbering Plan Administration, and Telecommunications Relay Service[9] Furthermore, WorldCom and other international common carriers that are subject to Section 43.61 of the Commission's rules must also report data for the preceding calendar year on actual traffic and revenue data for each service provided[10]

It is now a matter of public record that WorldCom committed a massive fraud, which caused significant financial injury to tens of thousands of small investors like Mrs. Snyder. In perpetrating this fraud, not only did WorldCom file knowingly false statements with the SEC, it knowingly filed numerous false statements with the FCC If WorldCom had been candid and truthful with the FCC, the fraud and resulting injury could have been avoided A licensee's duty of candor to the FCC is absolute. As the United States Court of Appeals has said "The FCC has an affirmative obligation to license more than 10,000 radio and television stations in the public interest . . As a

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[8] 47 C F R §§54 706, 54 711, 54 713, 64 604 All telecommunications carriers providing interstate telecommunications service, interstate telecommunications providers offering interstate telecommunications for a fee on a non-common carrier basis, and payphone providers that are aggregators must contribute to the Universal Service Fund and file a Telecommunications Reporting Worksheet annually (on FCC Form 499-A) and quarterly (on FCC Form 499-Q) 47 C F R §§ 54 706, 54 711, 54 713

[9] Every common carrier providing interstate telecommunications services is required to contribute to the Telecommunications Relay Services Fund based upon its relative share of interstate end-user telecommunications revenues 47 C F R § 64 604 The calculations are based on the Telecommunications Reporting Worksheet 47 C F R § 64 604(c)(5)(iii)(B) Moreover, all telecommunications carriers in the U S are required to contribute to the costs of establishing a numbering administration and the contributions are based on the Telecommunications Reporting Worksheets 47 C F.R § 52 17 All telecommunications carriers must contribute to the costs of long-term number portability 47 C F R § 52 32

[10] *Id*, *see also* 47 C F R § 43 61

result the Commission must rely heavily on the completeness and accuracy of the submissions made to it, and its applicants have an affirmative duty to inform the Commission of the facts it needs in order to fulfill its statutory mandate." *RKO General, Inc v FCC*, 670 F 2d 215, 232 (D C Cir 1981). See also, *SBC Communications*, 16 FCC Rcd 19091 (2001) "We consider misrepresentation to be a serious violation, as our entire regulatory scheme rests upon the assumption that applicants will supply [the Commission] with accurate information." In the past, the FCC has not hesitated to revoke a miscreant's licenses WorldCom's lies have not only defrauded untold numbers of innocent investors, but have made a mockery the FCC's requirement that a licensee must be honest and forthcoming with the Commission. If the FCC allows WorldCom to keep its licenses, such a decision would allow other criminals and con-artists to follow in WorldCom's dishonest footsteps If such a precedent were to be set, other scoundrels will demand from the FCC the same treatment as WorldCom, i.e. the right to keep their licenses despite having made numerous material misrepresentations to the FCC [11]

THE "NEW AND IMPROVED" WORLDCOM IS STILL MAKING MATERIAL MISREPRESENTATIONS TO THE FCC

In the Public Interest Statement of its applications, WorldCom holds itself out as a completely restructured and greatly improved company fully prepared to honestly and fiercely compete in the telecommunications marketplace.[12] For example, it claims: "WorldCom has also taken other significant internal action in response to the accounting irregularities it uncovered " (Public Interest Statement at p.8 emphasis added)

[11] See, *Melody Music, Inc v FCC*, 345 F 2d 750 (D C Cir 1965) (The Commission can not arrive at different outcomes in the cases of similarly-situated licensees)
[12] See, e g Public Interest Statement submitted in FCC Form 603 FCC Wireless Telecommunications Bureau Application for Assignment of Authorizations and Transfers of Control, lead call sign WPNU610, File No 0001348258

Accounting irregularities? How disingenuous to call the greatest accounting fraud in US history an "irregularity." In another part of the Public Interest Statement, WorldCom refers to the fraud it committed as "accounting improprieties" WorldCom lacks the simple candor necessary to be forthcoming with the FCC Instead it engages in euphemisms that do more to shed light on the true nature of WorldCom's current management, than they do to conceal its past conduct Simply stated, WorldCom's management cannot help itself Given the opportunity, WorldCom naturally gravitates toward statements that are knowingly false or lack candor

WorldCom's Public Interest Statement further claims that the proposed transfer "does not raise any of the traditional regulatory concerns that otherwise might be present with an acquisition, merger, or similar transaction The requested transfer and assignment therefore are purely a formality related to [WorldCom's] emergence from bankruptcy"[13] Really? Shouldn't the FCC consider the accounting "irregularities" and "improprieties"? WorldCom claims that the FCC is concerned only with "misconduct concerning the core regulatory responsibilities of the Commission – such as unlicensed broadcasts or unlawful billing practices – and not financial misconduct, which is under the purview of the SEC"[14] This statement is not only false, but is contrary to years of FCC case precedent Financial "irregularities," "improprieties" and "misconduct" are just euphemisms for criminal fraud, something the FCC must consider, since this type of behavior goes to the very core of a licensee's qualifications. It is black letter law that if the FCC cannot rely on a licensee to be truthful, candid, and forthcoming it cannot remain a Commission licensee. WorldCom, even in bankruptcy, is still a multi-billion

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[13] Public Interest Statement at p 14 (emphasis added)
[14] Public Interest Statement at p 21 (emphasis added)

dollar company, with highly paid management and a large legal department. Did no one in WorldCom's legal department research the law before making so obviously untrue a statement? A quick review of *Character Policy Statement* would have been sufficient. WorldCom knows the law. Rather than candidly present its case to the FCC, it instead chose to stay on its well-worn path of lies and deceit.

Likewise, WorldCom's answers to questions 75 and 77 on FCC Form 603 lack candor. Question 75 asks whether the Assignee or Transferee or any party to the application has ever been convicted of a felony. As discussed herein, WorldCom's key officers have been convicted of felonies for crimes committed in their capacities as employees of WorldCom. Surely this should have been disclosed. Question 77 asks whether the Assignee or Transferee or any party to the application is a party in a pending criminal matter. Sullivan, WorldCom's former Chief Financial Officer, Treasurer and Secretary has been indicted on numerous criminal fraud and conspiracy charges and is awaiting trial. The Department of Justice is still investigating WorldCom with a view toward bringing criminal charges. Just recently, new allegations of criminal behavior on the part of WorldCom have surfaced. Apparently, WorldCom has been defrauding its competitors for years by disguising calls to avoid paying access fees. All this should have been reported to the FCC.[15] In certifying, under penalty of perjury, that WorldCom, its officers and directors, have never been convicted of a felony and that there are no felony charges or criminal investigation pending, WorldCom has made material misrepresentations to the FCC.

[15] See, e.g. The *Wall Street Journal*, July 28, 2003 "MCI, Hoping to Exit Bankruptcy, Faces New Investigation of Fraud."

Has WorldCom's corporate culture really changed? Has WorldCom's current management learned anything from the disaster that was inflicted on innocent investors? A review of the pending applications and the Public Interest Statement demonstrates that WorldCom's managers have learned nothing The same tendency toward dishonesty and fraud that led to its collapse still prevails in WorldCom's corporate culture.

CONCLUSION

There is no euphemism for this, WorldCom is a criminal enterprise responsible for a massive accounting fraud resulting in losses of billions of dollars to innocent investors. Its new management is clearly following in the footsteps of its former, criminally indicted or convicted management. WorldCom continues to lack candor in its dealings with the FCC and now there are new charges that for years it has been defrauding its competitors.

WorldCom is like a rabid junkyard dog, it cannot be cured To protect the public, it must be put down The public interest, convenience and necessity, as well as the Commission's rules and policies require the revocation of WorldCom's licenses, authorizations and certifications.

Accordingly, Mrs Snyder requests that the FCC designate WorldCom's licenses, authorizations and certifications for revocation hearing

Respectfully submitted

By ______________________
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August 7, 2003

Exhibit I

DECLARATION

I, Margaret F. Snyder, declare under penalty of perjury as follows:

I am a retired 79 year-old widow. I reside at 117 Tabor Road, Oak Ridge, Tennessee. I have resided at this address for 52 years. Before I retired I was an elementary school teacher. I was the vice principal and taught mathematics at St. Mary's School in Oak Ridge for 32 years.

My husband passed away in 1985. I was left with a pension and a small nest egg. These would permit me to live comfortably in my retirement. I acquired my shares in MCI, now WorldCom, Inc. in 1988. I own 4,588 shares of WorldCom. At present the shares have a value of $229. At one time my WorldCom shares were worth as much as $295,971. This represented a significant percentage of my retirement nest egg.

I do not actively invest in the stock market. I acquired my WorldCom shares because I was told that WorldCom was a solid and safe investment. As a shareholder I received regular news, quarterly and annual reports from WorldCom. Nothing in WorldCom's reports suggested anything but a rosy future for WorldCom stock. I held on to my shares until it was too late.

I had intended to hold my shares in WorldCom and sell them from time to time as my needs required. However, the loss of such a significant investment has been devastating to me. I love to travel, but can no longer afford to do so. I had established a savings account for the education of my two grandchildren, but after my WorldCom stock became worthless, I was forced to ask for the money back. I have lost my sense of independence and security that I once had because of the diminution in the value of my WorldCom stock.

As a teacher, I always stressed to my students the importance of honesty and fair dealing. I acquired my WorldCom stock in good faith, believing it was a good investment that would grow and provide for me in my retirement. I am angered and dismayed that WorldCom's dishonesty resulted in such a significant loss to me and other innocent investors.

I ask that the FCC not allow WorldCom to transfer its licenses. I have read the Petition to Deny and find the statements contained therein to be true and correct to the best of my knowledge.

Executed this 6th day of August 2003.

Margaret F. Snyder

Margaret F. Snyder

CERTIFICATE OF SERVICE

I, Alissa A Portillo, do hereby certify that a copy of the foregoing "Petition to Deny Transfer of Licenses, Authorizations, and Certifications of WorldCom, Inc " was mailed by First Class U S Mail, postage prepaid or via email, this 7th day of August, 2003, to the following.

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